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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91193064
Party	Plaintiff FN Herstal
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Submission	Motion to Suspend for Settlement Discussions
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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

FN HERSTAL)	Opposition No.: 91193064
)	
Opposer)	
)	
v.)	
)	
SAEILO ENTERPRISES, INC.,)	
)	
Applicant.)	

AGREED MOTION TO SUSPEND PROCEEDINGS

Opposer FN Herstal, S.A., by and through its attorneys Burton S. Ehrlich of Ladas & Parry LLP, hereby by agreement, with the consent from the Applicant's attorneys Nancy Kennedy of Alix, Yale & Ristas, LLP hereby move to suspend the Opposition proceedings by the Trademark Office for a two (2) calendar month time period and should settlement not occur then to the resetting of all time periods beginning with the discovery time period and the due date for responding to outstanding discovery, as well as the resetting of all subsequent time periods. Further grounds for this agreed Motion for Suspension are set forth below:

The parties through their respective legal counsel have been in communication regarding possible settlement for this matter and for the potential comprehensive resolution of these proceedings. The parties are even in the process of considering and setting a telephone conference with respective counsel and principals for the parties for attempting to resolve matters through settlement.

Continued focus at settlement, rather than detracting from settlement and advancing discovery or other matters in these proceedings, at this time, is believed appropriate by the respective legal counsel for these parties. The possible settlement of this matter will alleviate the need for the pursuit of the Opposition proceedings. Additional time is needed for the parties, to negotiate a possible settlement, draft the settlement papers, potentially obtain signatures of the parties upon settlement papers, and to possibly seek the Trademark Office's approval of any papers which might be filed by the parties in accordance with the terms of a possible proposed settlement between the parties.

The parties reserve the right to resume proceedings at an earlier date by either party requesting the resetting of all time periods beginning with the date for responding to outstanding discovery, with the further resetting of the Discovery time period and all subsequent time periods, pending the disposition of the continued settlement negotiations between the parties, should these negotiations fail.

This Motion is not being submitted for any purpose of delay.

Telephone approval for this Motion was provided by counsel for the Applicant.

Under this Suspension the outstanding discovery in these proceedings would become due thirty (30) days following the resumption of the proceedings and based upon the foregoing with

the two month suspension the following dates would be reset as set forth below:

Proceedings Resume:	2/22/2012
Opposer To Respond To The Outstanding Discovery Thirty days Following Reinstatement of Proceedings	3/23/2012
Expert Disclosures Due	5/15/2012
Discovery Closes	6/14/2012
Plaintiff's Pretrial Disclosures	7/29/2012
Plaintiff's 30-day Trial Period Ends	9/13/2012
Defendant's Pretrial Disclosures	9/28/2012
Defendant's 30-day Trial Period Ends	11/11/2012
Plaintiff's Rebuttal Disclosures	11/26/2012
Plaintiff's 15-day Rebuttal Period Ends	12/26/2012

As this motion is consented to by Applicant's attorney, it is respectfully requested that it be granted and this case be suspended.

Respectfully submitted,

By:


One of Opposer's attorneys

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CERTIFICATE OF ELECTRONIC FILING

I hereby certify that this paper is being electronically filed with the United States Patent and Trademark Office on this 22nd day of December, 2011.


Burton S. Ehrlich

CERTIFICATE OF SERVICE

The undersigned, one of Opposer's attorneys, hereby certifies that on December 22, 2011, he caused a true and correct copies of the foregoing AGREED MOTION TO SUSPEND PROCEEDINGS to be served upon Applicant via e-mail and via First Class mail, postage pre-paid, at the following address:

Nancy Kennedy, Esq.
Alix, Yale & Ristas, LLP
750 Main Street
Hartford, CT 06103


Burton S. Ehrlich